

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KAREN MARIE KOZLOWSKI,

*Plaintiff,*

-against-

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

*Defendant.*

Case No.: 2019-cv-11640 (LJL-SN)

**~~PROPOSED~~ ORDER PURSUANT TO 15 U.S.C. § 1681b(a)(1)**

Plaintiff, through her attorney of record, respectfully proposes that the Court enter the following Order so that Defendant Experian Information Solutions, Inc. (“Experian”) has a permissible purpose pursuant to §1681b of the Fair Credit Reporting Act to disclose documents and information about consumers other than Plaintiff that are relevant to the parties’ respective claims and defenses in the above-captioned action (“Action”).<sup>1</sup>

WHEREAS, (a) in the Complaint in the above-captioned action Plaintiff alleges that information from Plaintiff’s credit file with consumer reporting agency Experian has been mixed, merged, or otherwise combined with information from the credit files of one or more other consumers (“other consumers”), and (b) discovery by Plaintiff of relevant documents and information concerning such other consumers is or may be necessary in order for Plaintiff to prosecute the action and/or for Experian to defend the Action;

THEREFORE, pursuant to § 1681b(a)(1) of the Fair Credit Reporting Act (15 U.S.C. § 1681b(a)(1)), the Court orders that Experian is permitted to disclose to Plaintiff and her counsel consumer reports about such other consumers and, as properly sought in discovery, other documents generated by Experian providing additional detail about the credit files of such other consumers as

---

<sup>1</sup> This Proposed Order pursuant to §1681b of the Fair Credit Reporting Act (“Order”) is submitted solely by Plaintiff. Experian does not oppose entry of the Proposed Order.

they have been maintained by Experian.

Respectfully submitted,

Dated: February 24, 2020

/s/ Adam G. Singer  
LAW OFFICE OF ADAM G. SINGER, PLLC  
One Grand Central Place  
60 E. 42nd Street, Suite 4600 New York, NY 10165  
212.842.2428  
*Counsel for Plaintiff*

SO ORDERED.



---

Hon. Lewis J. Liman  
United States District Judge

March 16, 2020